

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

**In re:**

Nathan Jovee,

**Plaintiff**

**and**

MEERA SHIN as a County of Snohomish contracted  
Guardian Ad Litem, COUNTY SNOHOMISH  
SHERIFF, DEPUTY  
SHERIFF JIM SIMONESCHI as a County of  
Snohomish Deputy Sheriff, L.M.E., INC., as a Legal  
Service Provider for the County of Snohomish and  
DOES 1-50,

**Defendants**

**NO. 2:22-CV-00168**

Notice of removal

**Sakgit county superior court**

**cause no 22-2-00076-29**

Pursuant to 28 U.S.C. § 1443, and 28 U.S.C. § 1446, Defendant Meera Shin hereby removes the above-entitled action to the United States District Court for the Western District of Washington at Seattle. Defendant states:

1. The above-entitled action was filed in the Superior Court of SKAGIT County, Cause No. 22-2-00076-29. A true and correct copy of the Complaint is attached as Exhibit A of the other defendant's.

2. Jurisdiction of this Court is based on 28 U.S.C. § 1331, 28 U.S.C. § 1343, 25 28 U.S.C. §1367, 28 U.S.C. §1441, and/or 28 U.S.C. §1443.

3. Plaintiff's various claims seek damages for violation of the Americans with Disabilities Act, 42 U.S.C. §12101 as well as state law claims.

4. Pursuant to 28 U.S.C. §1446(a), true and correct copies of all pleadings previously served on Defendant are attached by the other defendants to counsel's verification.

5. Defendant reserves any and all affirmative defenses, including but not limited to insufficient service of process.

Signed at Redmond, Washington on 2/17/22.



Meera Shin, Ph.D. Guardian ad Litem

#### **CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

#### **Attorneys for Defendant Snohomish County and Snohomish County Sheriff**

Deborah A. Severson

Margaret Duncan  
SNOHOMISH COUNTY PROSECUTING ATTORNEY'S OFFICE

3000 Rockefeller Avenue, M/S 504  
Everett, WA 98201-4046

Phone: (425) 262-2105

Email: [deborah.severson@co.snohomish.wa.us](mailto:deborah.severson@co.snohomish.wa.us);  
[margaret.duncan@co.snohomish.wa.us](mailto:margaret.duncan@co.snohomish.wa.us); [cindy.ryden@co.snohomish.wa.us](mailto:cindy.ryden@co.snohomish.wa.us); 10  
[lisa.lindquist@co.snohomish.wa.us](mailto:lisa.lindquist@co.snohomish.wa.us)

#### **PRO SE PLAINTIFF**

Nathan Jovee  
10115 Holly Drive, Apt. Q301

Everett, WA 98204

Phone: 425-530-7435

Email: [njovee@gmail.com](mailto:njovee@gmail.com) (email separately and U.S. Mail)

Signed at Redmond, Washington on 2/17/22\_\_\_\_\_.



\_\_\_\_\_  
Meera Shin, Ph.D. Guardian ad Litem